

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

FREE SPEECH SYSTEMS, LLC.,  
Debtor.

§  
§  
§  
§

Case No. 22-60043  
Chapter 11 (Subchapter V)

**AGREED ORDER GRANTING EMERGENCY MOTION OF THE LAW OFFICES OF RAY BATTAGLIA, PLLC, TO WITHDRAW AS COUNSEL FOR FREE SPEECH SYSTEMS, LLC**

On this day came on for consideration the *Emergency Motion of The Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel For Free Speech Systems, LLC* (the “Motion”) seeking an Order approving the Withdrawal of The Law Offices of Ray Battaglia, PLLC and its attorneys from representation of Free Speech Systems, LLC in the above styled chapter 11 case and all adversary proceedings filed in that case, and it appearing that notice, and service of such Motion has been made in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules promulgated thereunder, and after considering the pleadings of record and the arguments of counsel; and upon the Court's finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and (iii) venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The Motion is Granted.

2. Upon entry of an order approving new counsel, the Law Offices of Ray Battaglia, PLLC and its attorneys are authorized to withdraw as counsel for Free Speech Systems, LLC in this bankruptcy case and all adversary proceedings pending in this bankruptcy case and are relieved of further responsibility in those matters effective on the date of this Order.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: March \_\_\_\_\_ 2024.

**UNITED STATES BANKRUPTCY JUDGE**

AGREED:

THE LAW OFFICES OF RAY BATTAGLIA, PLLC.

By: /s/ Raymond W. Battaglia  
Raymond W. Battaglia  
Texas Bar No. 01918055  
66 Granbury Circle  
San Antonio, Texas 78218  
Telephone (210) 601-9405  
Email: [rbattaglia@outlook.com](mailto:rbattaglia@outlook.com)

MOVANT

O'CONNORWECHSLER PLLC

/s/ Annie E. Catmull  
Annie E. Catmull (Texas Bar No. 00794932)  
4400 Post Oak Parkway, Suite 2360  
Houston, Texas 77027  
Telephone: (281) 814-5977  
Email: [aecatmull@o-w-law.com](mailto:aecatmull@o-w-law.com)

PROPOSED COUNSEL FOR THE DEBTOR